

Company Name ("Carrier"): Westel Inc.

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Austin, Texas 78759

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- Carrier took no actions against data brokers in 2013, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission.
- The Carrier provides no electronic or online access to its customer(s) CPNI.
- The following is a summary of all customer complaints received in 2013 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2013 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0
 - Category of complaint:
 - N/A Number of instances of improper access by employees
 - N/A Number of instances of improper disclosure to individuals not authorized to receive the information
 - N/A Number of instances of improper access to online information by individuals not authorized to view the information
 - N/A Number of other instances of improper access or disclosure